

**Filed Via ECFS**

December 11, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

James Valley Cooperative Telephone Co. (JVT) is an ILEC headquartered in Groton, South Dakota serving over 3,000 rural customers in Northeast South Dakota. JVT also holds licensed spectrum from the FCC and provides 4G LTE fixed wireless voice and data services to its ILEC customers in its sparsely populated service area where its wireless coverage provides better broadband than its DSL service.

JVT's Form 477 shows that it provides a variety of technologies including ADSL 2, FTTP and Terrestrial Fixed Wireless within SAC 391664. All services are provided directly by JVT and there is no affiliate or other subsidiary involved.

The WCB released A-CAM Version 2.0, Report Version 3.0 and its illustrative results for rate of return carriers by a Public Notice DA 15-1154 on October 8, 2015. The results shown for JVT, SAC 391664 in South Dakota showed no A-CAM model-based funding. Upon review it appears the WCB has eliminated all potential A-CAM model support to JVT based on its FCC Form 477. It appears the FCC is eliminating JVT's potential A-CAM support for eligible census blocks based solely on its own fixed wireless service.

JVT can confirm there is another fixed wireless provider near its service area, Northern Wireless Communications, Inc. (NW), but NW does not cover 100% of JVT's study area and does not offer voice service. NW is therefore not a qualified unsubsidized competitor and no other unsubsidized competitors operate in JVT's study area (See Attachment A). JVT's assertions regarding the lack of unsubsidized competitors is also supported by the National Broadband Map, FCC released 477 data and other publicly available information.

The FCC's unsubsidized competitor rule, 47 CFR 54.319, was intended to eliminate universal service support in incumbent rate-of-return study areas where there was an unsubsidized competitor or a combination of unsubsidized competitors offering competitive voice and broadband services meeting FCC service benchmarks to 100 percent of the residential and business locations in the study area. In this case there is no unsubsidized competitor, but JVT's

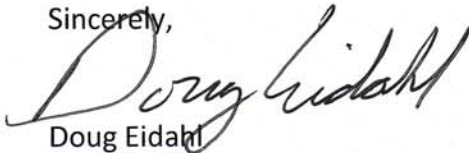
own fixed wireless service is being misconstrued in the Form 477 data as a competing service. It is not. It is JVT's own service (See Attachment B).

The FCC has encouraged carriers to use alternative fixed wireless technologies where needed in sparsely populated rural areas to give consumers the best possible broadband experience. JVT has done just that, but does not believe that it is a permanent broadband solution. In the short term JVT uses wireline ADSL 2 or FTTP service in some parts of its study area and fixed wireless in other parts of its service area where fixed wireless service is more cost effective. In the longer term, if sufficient USF funding is made available, JVT plans to construct a wired broadband network that can meet the ever growing needs of its customers.

To use JVT's own fixed wireless service from the Form 477 data, which is not even provided by an affiliate, against it in the A-CAM Version 2.0 illustrative results is in error. It is a misapplication of the Form 477 data and inconsistent with 47 CFR 54.319. The WCB and FCC should correct this discrepancy in future runs of the A-CAM model for JVT or other ILECs under similar circumstances.

Accordingly, Vantage Point Solutions respectfully requests the WCB correct this inaccuracy for James Valley Cooperative Telephone Co. and for other, similarly-situated rural providers. If we can provide any additional information on this matter please let us know.

Sincerely,

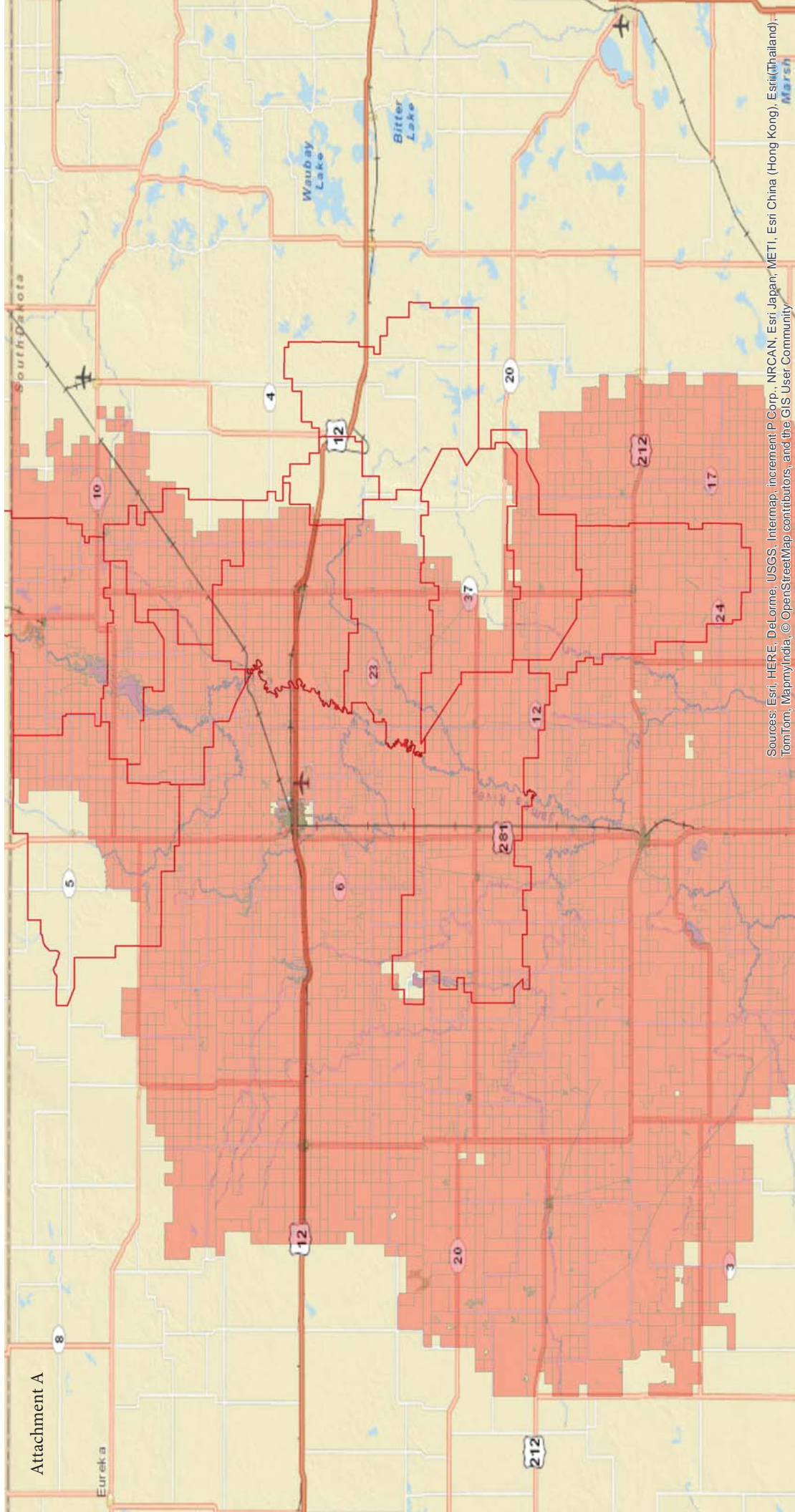


Doug Eidahl

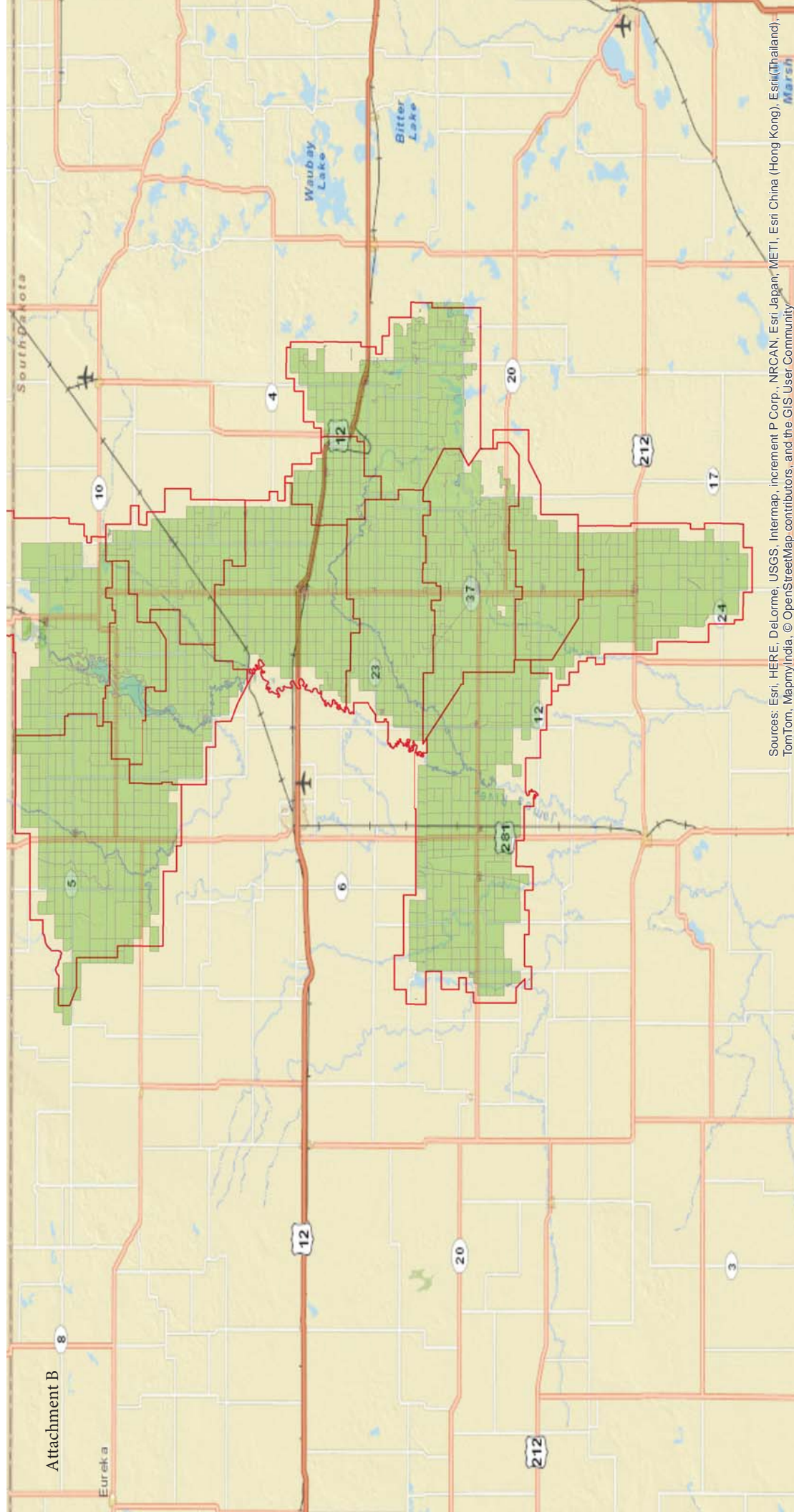
Vice President of Regulatory and Legal

Cc: James Groft, CEO, JVT  
Dusty Johnson, VP of Consulting, VPS  
Alex Minard, WCB  
Katie King, WCB





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Attachment B

Eureka

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community